

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION

WILLIAM KHALIL ROUND-DAVIS,	)	
	)	
Plaintiff,	)	
	)	
v.	)	CIVIL ACTION FILE NO.
	)	
FIRST ADVANTAGE BACKGROUND	)	
SERVICES, CORP.,	)	
and DOES 1-10 inclusive,	)	
	)	
Defendants.	)	

**COMPLAINT**

Plaintiff William Khalil Round-Davis files this Complaint for Damages and Demand for a Jury Trial against Defendants First Advantage Background Services, Corp., and DOES 1-10 inclusive and respectfully shows the Court the following:

**Nature of the Action**

1. Defendant is an employment screening company that furnishes employment screening reports to prospective employers. Its reports include a job applicant's criminal history.

2. On or about February, 2021, Plaintiff applied for employment with the FXG Vendor Doza Corp.

3. Plaintiff received a conditional job offer with the FXG Vendor Doza Corp.

4. On or about February 2, 2021, Defendant furnished an employment background check report to FXG Vendor Doza. The background check report was a consumer report under the Fair Credit Reporting Act (the “FCRA”). A copy of the report dated April 15, 2021 is attached as Exhibit “1”

5. The report contained incomplete and inaccurate criminal history information with no date of birth match in violation of the FCRA. The criminal record disclosed on the report also lacked core information such as a case number and stated that Plaintiff had a “Misdemeanor Failure to Appear” with the disposition “Pending Court Date Not Available”.

6. The report also contained an outdated motor vehicle report. A cursory search of the Cherokee County Clerk of Court shows that the record had been terminated on February 27, 2020 following successful completion of probation and payment of fines.

7. Defendant disclosed outdated criminal history. A copy of the public records information is attached as Exhibit “2”.

8. As a result of the inaccurate information reported by Defendant, Plaintiff was terminated by FXG Vendor Doza Corp.

9. Any cursory review of records from the Cherokee County Clerk of Court prior to disclosure would have alerted Defendant that probation had been satisfied, fines had been paid and the case had been terminated.

10. Accordingly, Plaintiff believes and thereon alleges that Defendant routinely and systematically disclosed database records that it knew to be inaccurate, incomplete, or not up to date without verification and therefore acted with reckless disregard of its duty under the FCRA to ensure the “maximum possible accuracy” of the information reported.

11. Under the FCRA, specifically 15 USC §1681e(b), Defendant was required to use reasonable procedures to ensure the maximum possible accuracy of the information it reported about Plaintiff to FXG Vendor Doza Corp. Disclosing outdated and inaccurate information is a clear violation of this statute.

12. In addition, when disclosing criminal records for employment purposes, a background check company is further required to use strict procedures to ensure that the reported information is complete and up to date.

13. A background check report which fails to disclose the current disposition is not complete and not up-to-date.

14. Defendant did not have defined processes to verify the accuracy of the public records information provided to FXG Vendor Doza Corp, because information related to Plaintiff’s criminal records is a matter of public information and is easily verifiable through the judicial system in the State of Georgia.

15. As a direct result of Defendant’s failure to verify public records, Plaintiff was terminated by FXG Vendor Doza Corp.

16. Plaintiff suffered, and continues to suffer actual damages and emotional distress as a result of the loss of employment.

17. Accordingly, Plaintiff seeks recovery for his actual damages, including loss of earnings, emotional distress, and damage to his reputation. Moreover, Plaintiff seeks statutory penalties, punitive damages, as well as attorney's fees and costs.

#### The Parties

18. Plaintiff is an individual, a consumer and resident of the County of Cobb, City of Kennesaw, Georgia.

19. Defendant is a consumer reporting agency within the meaning of the FCRA, specifically 15 USC §1681a(f).

20. Defendant First Advantage is a consumer reporting agency, and is and at all times herein mentioned was, a Foreign Corporation registered to do business in the State of Georgia, with its principal place of business at 1 Concourse Parkway, N.E., Suite 200, Atlanta, Georgia 30328. It may be served by Service of Process upon its registered agent, Corporation Service Company, at the address of 2 Sun Court, Suite 400, Peachtree Corners, GA 30092.

21. Plaintiff is ignorant of the Defendants sued herein as DOES 1-10, inclusive, and therefore sues those Defendants by such capacities when such information is ascertained through discovery.

22. Plaintiff is informed and believes and thereon alleges that each of the DOES 1-10 Defendants is responsible in some manner for the occurrences herein alleged and that Plaintiff's damages as herein alleged were proximately caused by such occurrences.

23. Plaintiff is informed and believes and thereon alleges that, at all times herein mentioned, Defendants DOES 1-10, were principals or agents of each other and of the named Defendants and in doing the things alleged in this complaint, were acting in the scope of such agency and with the permission and consent of Defendants.

Count 1 – Violation of 15 U.S.C. § 1681e(b)

24. Defendant willfully and/or recklessly violated 15 U.S.C. § 1681e(b) by disclosing inaccurate, incomplete and erroneous criminal information regarding Plaintiff.

25. Defendant's conduct was willful and/or reckless because it knew that its failure to report an updated disposition is insufficient to ensure maximum possible accuracy of the criminal history information reported.

26. Plaintiff is informed, and believes, and thereon alleges that Defendant failed to sufficiently conduct audits, reviews, or quality control of the information it reported.

27. Alternatively, Plaintiff alleges that Defendant's violations were negligent as Defendant did not utilize reasonable procedures to ensure the reported information about Plaintiff was accurate.

Count 2 – Violation of 15 U.S.C. § 1681k(a)

28. Plaintiff hereby incorporates by reference the allegations of each and every paragraph above.

29. Plaintiff is informed and believes, and thereon alleges that Defendant willfully and/or recklessly failed to use strict procedures to ensure the reported information is complete and up to date despite knowing that the erroneous public record was likely to have an adverse effect upon Plaintiff's ability to obtain employment.

30. Alternatively, Plaintiff alleges that Defendant's violations were negligent.

WHEREFORE, Plaintiff prays for judgment against Defendants, and each of them, as follows:

- a. For statutory, compensatory, special, general, and punitive damages according to proof and as applicable against all Defendants;
- b. For interest upon such damages as permitted by law;

- c. For an award of reasonable attorneys' fees provided by law under all applicable statutes;
- d. For the costs of the lawsuit;
- e. and
- f. For such other orders of the Court and further relief as the Court deems just and proper.
- g. Plaintiff hereby requests and demand a jury trial on all issues triable by jury.

This 1st day of February, 2023.

**MCRAE BERTSCHI & COLE LLC**  
1872 Independence Square, Suite D  
Dunwoody, Georgia 30338

*Counsel for Plaintiff*

/s/ Craig E. Bertschi

Craig E. Bertschi  
Georgia Bar No. 055739  
[ceb@mcraebertschi.com](mailto:ceb@mcraebertschi.com)  
678.999.1102

*To be admitted as counsel for Plaintiff pro hac vice:*

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DHF Law, PC  
2304 Huntington Drive, Suite 210  
San Marino, CA 91108  
Ph: (888) 651-6411  
Fax: (818) 484-2023

# Exhibit 1





# First Advantage

April 15, 2021

WILLIAM ROUND DAVIS  
4201 E CRAIG RD APT 3096  
N LAS VEGAS, NV 89030

We received your request to obtain a copy of the Employment Verification Report that was requested by a potential employer or volunteer organization. We have reviewed our records and found results matching the identification information you provided. A copy of the reported information has been enclosed for your records.

If you believe any of the information on your report is incorrect or incomplete and you wish to file a dispute, please contact us by phone, fax, or mail.

**First Advantage Consumer Center**  
**P.O. Box 105292**  
**Atlanta, GA 30348-5292**  
**Toll free phone: 1-800-845-6004**  
**Fax: 727-214-2127**

First Advantage provides Employment Verification Reports to employers that have a job applicant's or an employee's consent. Employers work with a variety of companies to obtain employment verification information. Our files would only contain information on you if First Advantage provided your Employment Verification Report to an employer or volunteer organization.

To learn more about First Advantage background reports and other First Advantage consumer services, please visit our consumer web site <http://www.fadv.com/solutions/solutions/consumer-solutions>.

Thank you for giving us the opportunity to assist you.

First Advantage Consumer Advocacy Center (7233)

NOTE: Phone calls to our Consumer Center may be monitored for quality assurance.

## Background Report

Confidential

WILLIAM ROUND DAVIS  
XXX-XX-XXXX  
CID - 186572572

FXG VENDOR DOZA CORP  
5357 POLIZZE AVE  
.  
LAS VEGAS, NV 89141-3914

Caution to Customer: Under the terms of the service agreement, this report is delivered with the understanding that the recipient client will hold the same in strict confidence and not disclose it to third parties and furthermore is to be used only for the purpose indicated in the Client's agreement for service, i.e. employment/volunteer/or resident/tenant screening purposes. This report and information provided therein is strictly confidential as it contains personal and sensitive information of the consumer/applicant/candidate/employee and must be utilized solely for the business purposes consistent with the declared purpose in the service agreement and is not to be used by the client or third parties for any other purposes. Client agrees to abide and comply with all applicable laws in connection with this report including data privacy, data protection laws and other similar applicable regulations.

First Advantage is not the source of the data provided in this report in that the data is collected by First Advantage from third party data sources such as public records held in governmental databases or courthouses, schools, colleges, universities, company officials, or third party proprietary databases etc. Accordingly First Advantage does not warrant the accuracy of the information provided by those third parties and expressly disclaims any and all liability for any and all claimed losses, damages, expenses including attorney fees and costs incurred as a result of reliance upon the content of this report.

For US-based Clients or Clients obtaining reports on US residents: Client certifies that it has complied with the Fair Credit Reporting Act (FCRA) and that it has provided a clear disclosure in compliance with the FCRA to the consumer/applicant/candidate/employee and obtained consent and authorization from the consumer/applicant/candidate employee in order to receive this report. If the client intends to take adverse action based in whole or in part on the contents of this report, the client must provide the consumer with a copy of the report, a summary of consumers rights as prescribed by FCRA section 1681g(c)(3) and a copy of any applicable state law rights before taking any action, wait a reasonable period of time for the consumer to dispute any inaccurate information and then can take adverse action. First Advantage has provided your company with copies of the CFPB Summary of Rights for this purpose.

For California based Clients or Clients obtaining reports on California residents: In California an investigative consumer reporting agency shall provide a consumer seeking to obtain a copy of a report or making a request to review a file, a written notice in simple, plain English and Spanish setting forth the terms and conditions of his or her right to receive all disclosures.

If you are a First Advantage Consumer

Please contact the First Advantage Consumer Center at:  
1-800-845-6004 Toll Free (within the U.S.)  
+1 971-280-8128 Toll Number (outside the U.S.)

Or visit <http://fadv.com/our-company/contact-support.aspx> for local contact details

First Advantage Customers

Please contact the WEST COVINA EMPLOYMENT SERVICE CENTER at:  
(800)888-5773 (outside North America +1 971-280-8128)

## General Consumer Information

Consumer's Name WILLIAM ROUND DAVIS

CSP ID V0005370

Client Name FXG VENDOR DOZA CORP

FEDEX ID 8280990

The following consumer information was used in the production of this report:  
 Last Name, First Name, Middle Name, SSN, Date of Birth, Address

SSN XXX-XX-XXXX

Address [REDACTED]

Date of Birth XX/XX/XXXX

Consumer Contact [REDACTED]

Consumer Alternate Contact

## Other Names Provided

Last Name, Suffix	First Name	Middle Name
ROUND DAVIS	WILLIAM	None Provided

## Information Regarding this Order:

Position Applied For

Date Ordered 02/Feb/2021 02:01:13 PM

Background Check Completion 03/Feb/2021 11:22:14 AM  
 Date

Report Last Updated on 03/Feb/2021 11:22:14 AM

Date Report Printed 15/Apr/2021 04:39:45 PM

Report ETA 04/Feb/2021

## Select From Drop Down

Label	Value
Company ID	300 - ISP Pickup & Delivery
Facility ID	00891 - LAS VEGAS, NV
Position Type	A - P&D Non-CDL Driver
Driver Type	
Person Request ID	2301983

All timestamps represent US Eastern Time

## First Advantage Background Report Summary

Consumer's Name WILLIAM ROUND DAVIS

Date Ordered: 02/Feb/2021 02:01:13 PM

Background Check Completion 03/Feb/2021 11:22:14 AM

Date:

Score Result In-Eligible For Hire

Package Name: DIGITAL - A - NON CDL DRIVER PKG REPORT CODE			
Package Searches Ordered	Status	Review	Score
Social Security Verification	Complete	No	
Social Security Verification	Complete	No	Pass
First Advantage National Criminal File	Complete	No	
First Advantage National Criminal File N LAS VEGAS, CLARK, NV	Complete	No	Eligible
Statewide Criminal	Complete		
Alabama Administrative Office Of The Courts	Complete	No	Eligible
Georgia Crime Information Center	Complete	Yes*	Ineligible
Felony Including Misdemeanor	Complete	No	
Felony Including Misdemeanor N LAS VEGAS, CLARK, NV	Complete	No	Eligible
Federal Criminal	Complete	No	
Federal Criminal N LAS VEGAS, CLARK, NV	Complete	No	Eligible
Federal Criminal BIRMINGHAM, JEFFERSON, AL	Complete	No	Eligible
Federal Criminal KENNESAW, COBB, GA	Complete	No	Eligible
Global Sanction Search	Complete	No	
First Advantage Global Sanction Search	Complete	No	Eligible
Motor Vehicle Report	Complete	No	
Motor Vehicle Report	Complete	No	Eligible
Additional Searches Ordered			
NONE			

\* Further review is required by the client to determine the consumer's eligibility based on background check results. Please refer to the corresponding detailed component report section for additional information.

\*\* Further review is required by the client to determine the consumer's eligibility based on background check results. Please refer to the corresponding detailed component report section for additional information.

\*\*\* This product has been blocked from delivery due to compliance related restrictions.

## Social Security Number Validation

## Note

The Social Security Number Validation is a process where the SSN is confirmed as being issued by the Social Security Administration. The Social Security Number Validation also confirms that the SSN does not belong to a deceased individual.

Valid SSN? Yes

State Issued ALABAMA

Date Issued BETWEEN 1995-1997

Reported Deceased? No

## Disclaimer

The results of the Social Security Number Validation do not provide a verification that the Social Security Number belongs to the Consumer of this report.

## Social Security Verification

Status: Complete

Score: Pass

Date Completed: 02/Feb/2021

The Social Security Number Verification (SSNV) matches the given SSN against consumer credit files contained in the databases of nationwide credit reporting agencies. The credit bureaus' consumer credit files contain information provided by companies with which the consumer has had financial dealings and/or public record information collected by the bureaus from the courts. The SSNV does not verify that the Social Security Administration issued a specific SSN to a consumer.

Social Security Verification results and Remarks returned from this search are for informational purposes and should not be relied upon as a basis for determining the eligibility of a consumer for credit, insurance, employment or any other product or service, without additional review with and clarification from the consumer.

SOCIAL SECURITY VERIFICATION NAME AND ADDRESS INFORMATION OBTAINED FROM: EXPERIAN

## Customer Provided Information

SSN XXX-XX-XXXX

DOB XX/XX/XXXX

SSN State Issued

SSN Year Issued 1997

Name Type Report Subject

Name DAVIS, WILLIAM

Name Type Former Name

Name ROUND DAVIS, WILLIAM K

Name Type Former Name

Name BROWN-DAVIS, WILLIAM KHALIL

Name Type Former Name

Name DAVIS, WILL K

Addr Type Residence Address

First Date 10/01/2016 Last 10/01/2016

Address

Addr Type Former Address

First Date 04/01/2017 Last 04/01/2017

Address 2031 LONGLEAF DR APT G

BIRMINGHAM, AL 35216

Addr Type Former Address

First Date 05/01/2017 Last 12/01/2017

Address 4929 WILLOW CREEK DR

WOODSTOCK, GA 30188

Addr Type Former Address

First Date 09/01/2020 Last 09/01/2020

Address 4982 SHALLOW RIDGE RD NE

KENNESAW, GA 30144

## Remarks and/or Social Security Alerts

02/02/21: SUBJECT NAME RETURNED MATCHED WITH A DEVELOPED NAME.

02/02/21: AN ADDRESS DISCREPANCY WAS FOUND. SUBJECT ADDRESS DOES NOT MATCH ADDRESS ON FILE.

02/02/21: NO ALERTS RETURNED FROM SEARCH.

## Order Process History

Date

Description

02/Feb/2021 02:01:44 PM	Search In Progress.
02/Feb/2021 02:01:47 PM	Record Judged.

First Advantage National Criminal File N LAS VEGAS, CLARK, NV

Status: Complete

Score: Eligible

Date Completed: 02/Feb/2021

Record Source	DATABASE SEARCH
Search Results	No Record Found
Search Type	First Advantage National Criminal File Search
Date of Search	02/Feb/2021
Address Covered	4201 E CRAIG RD APT 3096
Address City Covered	N LAS VEGAS
Address County Covered	CLARK
Address State Covered	NV
Address Zip	89030
Given Name Searched	WILLIAM ROUND DAVIS

## Order Process History

Date	Description
02/Feb/2021 02:01:44 PM	Record Ordered.
02/Feb/2021 02:05:13 PM	Search In Progress.
02/Feb/2021 02:05:13 PM	Record Judged.

Felony Including Misdemeanor N LAS VEGAS, CLARK, NV

Status: Complete

Score: Eligible

Date Completed: 02/Feb/2021

Record Source	CLARK 8TH JUDICIAL DISTRICT COURT
Search Results	No Record Found
Search Type	FELONY INDEX SEARCH INCLUDE MISDEMEANORS
Date of Search	02/Feb/2021
Search Period	01/19/2011 - 01/19/2021
Address Covered	4201 E CRAIG RD APT 3096
Address City Covered	N LAS VEGAS
Address County Covered	CLARK
Address State Covered	NV
Address Zip	89030
Location	200 LEWIS AVENUE LAS VEGAS CLARK COUNTY
Given Name Searched	WILLIAM ROUND DAVIS
Developed Name Searched	WILLIAM ROUND DAVIS

## Source Status History

Status Date	Description
02/Feb/2021 02:02:22 PM	Search in progress. Estimated completion by 02/03/2021

## Order Process History

Date	Description
02/Feb/2021 02:01:44 PM	Search In Progress.

02/Feb/2021 02:02:07 PM	Search In Progress.
02/Feb/2021 02:13:11 PM	Record Judged.

Federal Criminal N LAS VEGAS, CLARK, NV

Status: Complete

Score: Eligible

Date Completed: 02/Feb/2021

Record Source	US DISTRICT COURT OF NEVADA
Search Results	No Record Found
Search Type	FEDERAL FELONY & MISDEMEANOR SEARCH
Date of Search	02/Feb/2021
Search Period	01/19/2014 - 01/19/2021
Address Covered	4201 E CRAIG RD APT 3096
Address City Covered	N LAS VEGAS
Address County Covered	CLARK
Address State Covered	NV
Address Zip	89030
Location	333 LAS VEGAS BOULEVARD SOUTH ROOM 4426 LAS VEGAS CLARK COUNTY
Given Name Searched	WILLIAM ROUND DAVIS
Developed Name Searched	WILLIAM ROUND DAVIS

## Source Status History

Status Date	Description
02/Feb/2021 02:02:20 PM	Search in progress. Estimated completion by 02/03/2021

## Order Process History

Date	Description
02/Feb/2021 02:01:44 PM	Search In Progress.
02/Feb/2021 02:01:57 PM	Search In Progress.
02/Feb/2021 02:13:10 PM	Record Judged.

Federal Criminal BIRMINGHAM, JEFFERSON, AL

Status: Complete

Score: Eligible

Date Completed: 02/Feb/2021

Record Source	US DISTRICT COURT NORTHERN DISTRICT OF ALABAMA
Search Results	No Record Found
Search Type	FEDERAL FELONY & MISDEMEANOR SEARCH
Date of Search	02/Feb/2021
Search Period	01/19/2014 - 01/19/2021
Address Covered	2031 LONGLEAF DR APT G
Address City Covered	BIRMINGHAM
Address County Covered	JEFFERSON
Address State Covered	AL
Location	1729 5TH AVENUE NORTH U.S. COURTHOUSE - ROOM 140 BIRMINGHAM JEFFERSON COUNTY
Given Name Searched	WILLIAM ROUND DAVIS
Developed Name Searched	WILLIAM ROUND DAVIS

## Source Status History

Status Date	Description
02/Feb/2021 02:03:26 PM	Search in progress. Estimated completion by 02/03/2021

  

Order Process History	
Date	Description
02/Feb/2021 02:01:46 PM	Search In Progress.
02/Feb/2021 02:03:16 PM	Search In Progress.
02/Feb/2021 02:13:11 PM	Record Judged.

Federal Criminal KENNESAW, COBB, GA		Status: Complete
Date Completed: 02/Feb/2021		Score: Eligible

  

Record Source	US DISTRICT COURT NORTHERN DISTRICT OF GEORGIA
Search Results	No Record Found
Search Type	FEDERAL FELONY & MISDEMEANOR SEARCH
Date of Search	02/Feb/2021
Search Period	01/19/2014 - 01/19/2021
Address Covered	4982 SHALLOW RIDGE RD NE
Address City Covered	KENNESAW
Address County Covered	COBB
Address State Covered	GA
Location	75 SPRING STREET SW ROOM 2211 ATLANTA FULTON COUNTY
Given Name Searched	WILLIAM ROUND DAVIS
Developed Name Searched	WILLIAM ROUND DAVIS

  

Source Status History	
Status Date	Description
02/Feb/2021 02:03:31 PM	Search in progress. Estimated completion by 02/03/2021

  

Remark

02/02/21: THIS SEARCH ALSO COVERS: 4929 WILLOW CREEK DR, WOODSTOCK, CHEROKEE COUNTY, GA;  
4045 GEORGE BUSBEE PKWY NW, KENNESAW, COBB COUNTY, GA;

  

Order Process History	
Date	Description
02/Feb/2021 02:01:45 PM	Search In Progress.
02/Feb/2021 02:02:26 PM	Search In Progress.
02/Feb/2021 02:13:10 PM	Record Judged.

Statewide Criminal - Alabama Administrative Office Of The Courts		Status: Complete
Date Completed: 02/Feb/2021		Score: Eligible

  

Record Source	ALABAMA STATE COURT ADMINISTRATOR
Search Results	No Record Found
Search Type	ALABAMA ADMINISTRATIVE OFFICE OF THE COURTS SEARCH
Date of Search	02/Feb/2021
Search Period	01/19/2011 - 01/19/2021
Location	300 DEXTER AVENUE MONTGOMERY MONTGOMERY COUNTY
Given Name Searched	WILLIAM ROUND DAVIS



Developed Name Searched	WILLIAM ROUND DAVIS
-------------------------	---------------------

Source Status History	
Status Date	Description
02/Feb/2021 02:03:30 PM	Search in progress. Estimated completion by 02/03/2021

Remark

THIS SEARCH COVERED, BUT NOT LIMITED TO: 2031 LONGLEAF DR APT G, BIRMINGHAM, JEFFERSON COUNTY, AL,

Order Process History	
Date	Description
02/Feb/2021 02:01:46 PM	Search In Progress.
02/Feb/2021 02:03:11 PM	Search In Progress.
02/Feb/2021 02:20:52 PM	Record Judged.

Statewide Criminal - Georgia Crime Information Center		Status: Complete Score: Ineligible
Date Completed: 03/Feb/2021		

Record Source	GEORGIA BUREAU OF INVESTIGATIONS
Search Results	Record Found
Search Type	GEORGIA CRIME INFORMATION CENTER SEARCH
Date of Search	03/Feb/2021
Search Period	01/19/2011 - 01/19/2021
Location	3121 PANTHERSVILLE ROAD DECATUR DE KALB COUNTY
Given Name Searched	WILLIAM ROUND DAVIS
Developed Name Searched	WILLIAM ROUND DAVIS
<p>Full matched by the following identifiers: First Name, DOB, SSN</p> <p>Developed matched by the following identifiers: Middle Name</p>	
Case Reference #	NA
Case Date	17/Nov/2019
Name on File	WILLIAM KHALIL ROUND-DAVIS
SSN on File	XXX-XX-XXXX
DoB on File	XX/XX/XXXX
Charge	FAILURE TO APPEAR
Charge Type	MISDEMEANOR
Disposition	PENDING COURT DATE NOT AVAILABLE
Disposition Date	17/Nov/2019
Sentence	OTHER ORIGINAL CHARGE NOT LISTED

Source Status History	
Status Date	Description
02/Feb/2021 02:02:25 PM	Search in progress. Estimated completion by 02/04/2021

Remark

02/02/21: THIS SEARCH COVERED, BUT NOT LIMITED TO: 4982 SHALLOW RIDGE RD NE, KENNESAW, COBB COUNTY, GA, 4929 WILLOW CREEK DR, WOODSTOCK, CHEROKEE COUNTY, GA;  
4045 GEORGE BUSBEE PKWY NW, KENNESAW, COBB COUNTY, GA;

Order Process History	
Date	Description

02/Feb/2021 02:01:45 PM	Search In Progress.
02/Feb/2021 02:02:16 PM	Search In Progress.
03/Feb/2021 10:18:32 AM	Search In Progress.
03/Feb/2021 11:10:34 AM	Record Judged.

## First Advantage Global Sanction Search

Status: Complete  
Score: Eligible

Date Completed: 02/Feb/2021

Record Source	FIRST ADVANTAGE GLOBAL SANCTIONS DATABASE
Search Results	No Record Found
Search Type	FIRST ADVANTAGE GLOBAL SANCTION SEARCH
Date of Search	02/Feb/2021
Search Period	01/19/2014 - 02/02/2021
Location	CONCOURSE PKWY ATLANTA FULTON COUNTY
Given Name Searched	WILLIAM ROUND DAVIS
Developed Name Searched	WILLIAM ROUND DAVIS

## Source Status History

Status Date	Description
02/Feb/2021 02:02:23 PM	Search in progress. Estimated completion by 02/03/2021

## Order Process History

Date	Description
02/Feb/2021 02:01:44 PM	Search In Progress.
02/Feb/2021 02:02:10 PM	Search In Progress.
02/Feb/2021 02:13:12 PM	Search In Progress.
02/Feb/2021 02:13:12 PM	Record Judged.

## Motor Vehicle Report

Status: Complete  
Score: Eligible

Date Completed: 02/Feb/2021

Request Date: 02/Feb/2021

## Subject Information

Customer Provided  
WILLIAM ROUND DAVIS  
[REDACTED]  
XX/XXX/XXXX

DMV Provided  
WILLIAM KHALIL ROUND-DAVIS  
[REDACTED]  
XX/XXX/XXXX

## License Information

License # XXXXXXXXX	License State GA
Points 0.0	
License Type PERSONAL	
License Status Category VALID	
License Status VALID	License Status Description VALID
License Class C	Class Description C - SINGLE VEH < 26K
Endorsements	

## Restrictions

Issue Date 07/Dec/2019

Expiration Date 07/Dec/2027

Original Issue Date 04/Jun/2015

## Violations

Type	Viol Date	Conv Date	Description	Points
VIOL	24/Jul/2017	15/Jan/2020	FAILURE TO MAINTAIN INSURANCE	0.0
Addl Desc: FAILURE TO MAINTAIN REQUIRED LIABILITY INSURANCE Vehicle Speed: Speed Zone: Commercial Vehicle: false Fatality: false Suspension Id: Action Taken: Event Type: VIOLATION State Code: 40610 ACD: D36 AVD: DE06 Court: CHEROKEE STATE COURT Jurisdiction: GA City: GEORGIA Disposition: NOLO CONTENDERE				

## Suspensions and Reinstatements

Type	Viol Date	Conv Date	Description
Suspension	13/Aug/2015		FAILURE TO APPEAR, ACDDescription:  Suspension Date: 16/Mar/2016 Reinstmt Date: 14/Dec/2016 State Code: - Event Type: SUSPENSION ACD: D45 AVD: UE07 Extent: ALL Jurisdiction: GA Suspension Reinstatement Paid: 14/Dec/2016

## Miscellaneous State Specific Information

Medical Certificate Info	Description MEDICAL CERTIFICATE INFORMATION
Medical Certificate Info	EventType MEDICAL CERTIFICATE
StateMessage	Line - 01 Alert: Requested last name (ROUND DAVIS) did not match.

Driver Record Information obtained by First Advantage Corporation on customer's behalf from the Department of Motor Vehicle records of the state/province of GA. Identification of driver is based on information submitted. Before taking adverse action in an employment decision based on this report, the FCRA requires you to provide the consumer with a copy of the consumer report, along with a written description of the consumer's rights under the FCRA. First Advantage Corporation has provided your company with the copies of the consumer rights statements for this purpose. If you have any questions regarding the content of this Driving History Report please contact Customer Care at 888-947-2622. Thank you

## Remark

02/02/21: ONE OR MORE VIOLATIONS  
 ONE OR MORE HISTORICAL ACTIONS

## Order Process History

Date	Description
02/Feb/2021 02:01:43 PM	Search In Progress.
02/Feb/2021 02:01:44 PM	Search In Progress.
02/Feb/2021 02:01:49 PM	Search In Progress.
02/Feb/2021 02:06:03 PM	Record Judged.

Para informacion en espanol, visite [www.consumerfinance.gov/learnmore](http://www.consumerfinance.gov/learnmore) o escribe a la Consumer Financial Protection Bureau, 1700 G Street N.W., Washington, D.C. 20552.

#### A Summary Of Your Rights Under the Fair Credit Reporting Act

The federal Fair Credit Reporting Act (FCRA) promotes the accuracy, fairness, and privacy of information in the files of consumer reporting agencies. There are many types of consumer reporting agencies, including credit bureaus and specialty agencies (such as agencies that sell information about check writing histories, medical records, and rental history records). Here is a summary of your major rights under the FCRA. For more information, including information about additional rights, go to [www.consumerfinance.gov/learnmore](http://www.consumerfinance.gov/learnmore) or write to: Consumer Financial Protection Bureau, 1700 G Street N.W., Washington, DC 20552.

- You must be told if information in your file has been used against you. Anyone who uses a credit report or another type of consumer report to deny your application for credit, insurance, or employment - or to take another adverse action against you - must tell you, and must give you the name, address, and phone number of the agency that provided the information.
- You have the right to know what is in your file. You may request and obtain all the information about you in the files of a consumer reporting agency (your "file disclosure"). You will be required to provide proper identification, which may include your Social Security number. In many cases, the disclosure will be free. You are entitled to a free file disclosure if:
  - a person has taken adverse action against you because of information in your credit report;
  - you are the victim of identity theft and place a fraud alert in your file;
  - your file contains inaccurate information as a result of fraud;
  - you are on public assistance;
  - you are unemployed but expect to apply for employment within 60 days.

In addition, all consumers are entitled to one free disclosure every 12 months upon request from each nationwide credit bureau and from nationwide specialty consumer reporting agencies. See [www.consumerfinance.gov/learnmore](http://www.consumerfinance.gov/learnmore) for additional information.
- You have the right to ask for a credit score. Credit scores are numerical summaries of your credit-worthiness based on information from credit bureaus. You may request a credit score from consumer reporting agencies that create scores or distribute scores used in residential real property loans, but you will have to pay for it. In some mortgage transactions, you will receive credit score information for free from the mortgage lender.
- You have the right to dispute incomplete or inaccurate information. If you identify information in your file that is incomplete or inaccurate, and report it to the consumer reporting agency, the agency must investigate unless your dispute is frivolous. See [www.consumerfinance.gov/learnmore](http://www.consumerfinance.gov/learnmore) for an explanation of dispute procedures.
- Consumer reporting agencies must correct or delete inaccurate, incomplete, or unverifiable information. Inaccurate, incomplete or unverifiable information must be removed or corrected, usually within 30 days. However, a consumer reporting agency may continue to report information it has verified as accurate.
- Consumer reporting agencies may not report outdated negative information. In most cases, a consumer reporting agency may not report negative information that is more than seven years old, or bankruptcies that are more than 10 years old.
- Access to your file is limited. A consumer reporting agency may provide information about you only to people with a valid need -- usually to consider an application with a creditor, insurer, employer, landlord, or other business. The FCRA specifies those with a valid need for access.
- You must give your consent for reports to be provided to employers. A consumer reporting agency may not give out information about you to your employer, or a potential employer, without your written consent given to the employer. Written consent generally is not required in the trucking industry. For more information, go to [www.consumerfinance.gov/learnmore](http://www.consumerfinance.gov/learnmore).
- You may limit "prescreened" offers of credit and insurance you get based on information in your credit report. Unsolicited "prescreened" offers for credit and insurance must include a toll-free phone number you can call if you choose to remove your name and address from the lists these offers are based on. You may opt-out with the nationwide credit bureaus at 1-888-5-OPTOUT (1-888-567-8688).
- The following FCRA right applies with respect to nationwide consumer reporting agencies:

#### CONSUMERS HAVE THE RIGHT TO OBTAIN A SECURITY FREEZE

You have a right to place a "security freeze" on your credit report, which will prohibit a consumer reporting agency from releasing information in your credit report without your express authorization. The security freeze is designed to prevent credit, loans, and services from being

approved in your name without your consent. However, you should be aware that using a security freeze to take control over who gets access to the personal and financial information in your credit report may delay, interfere with, or prohibit the timely approval of any subsequent request or application you make regarding a new loan, credit, mortgage, or any other account involving the extension of credit.

As an alternative to a security freeze, you have the right to place an initial or extended fraud alert on your credit file at no cost. An initial fraud alert is a 1-year alert that is placed on a consumer's credit file. Upon seeing a fraud alert display on a consumer's credit file, a business is required to take steps to verify the consumer's identity before extending new credit. If you are a victim of identity theft, you are entitled to an extended fraud alert, which is a fraud alert lasting 7 years.

A security freeze does not apply to a person or entity, or its affiliates, or collection agencies acting on behalf of the person or entity, with which you have an existing account that requests information in your credit report for the purposes of reviewing or collecting the account. Reviewing the account includes activities related to account maintenance, monitoring, credit line increases, and account upgrades and enhancements.

- You may seek damages from violators. If a consumer reporting agency, or, in some cases, a user of consumer reports or a furnisher of information to a consumer reporting agency violates the FCRA, you may be able to sue in state or federal court.
- Identity theft victims and active duty military personnel have additional rights. For more information, visit [www.consumerfinance.gov/learnmore](http://www.consumerfinance.gov/learnmore).

States may enforce the FCRA, and many states have their own consumer reporting laws. In some cases, you may have more rights under state law. For more information, contact your state or local consumer protection agency or your state Attorney General. For information about your federal rights, contact:

TYPE OF BUSINESS:	CONTACT
1.a. Banks, savings associations, and credit unions with total assets of over \$10 billion and their affiliates.  b. Such affiliates that are not banks, savings associations, or credit unions also should list, in addition to the CFPB:	a. Consumer Financial Protection Bureau 1700 G Street NW Washington, DC 20552  b. Federal Trade Commission: Consumer Response Center - FCRA Washington, DC 20580 (877) 382-4357
2. To the extent not included in item 1 above:  a. National banks, federal savings associations, and federal branches and federal agencies of foreign banks  b. State member banks, branches and agencies of foreign banks (other than federal branches, federal agencies, and insured state branches of foreign banks), commercial lending companies owned or controlled by foreign banks, and organizations operating under section 25 or 25A of the Federal Reserve Act  c. Nonmember Insured Banks, Insured State Branches of Foreign Banks, and insured state savings associations  d. Federal Credit Unions	a. Office of the Comptroller of the Currency Customer Assistance Group 1301 McKinney Street, Suite 3450 Houston, TX 77010-9050  b. Federal Reserve Consumer Help Center P.O. Box 1200 Minneapolis, MN 55480  c. FDIC Consumer Response Center 1100 Walnut Street, Box #11 Kansas City, MO 64106  d. National Credit Union Administration Office of Consumer Protection (OCP) Division of Consumer Compliance and Outreach (DCCO) 1775 Duke Street Alexandria, VA 22314
3. Air carriers	Asst. General Counsel for Aviation Enforcement & Proceedings Aviation Consumer Protection Division Department of Transportation 1200 New Jersey Avenue, S.E. Washington, DC 20590
4. Creditors Subject to Surface Transportation Board	Office of Proceedings, Surface Transportation Board Department of Transportation 395 E Street SW Washington, DC 20423
5. Creditors Subject to Packers and Stockyards Act	Nearest Packers and Stockyards Administration area supervisor
6. Small Business Investment Companies	Associate Deputy Administrator for Capital Access United States Small Business Administration 409 Third Street, SW, 8th Floor Washington, DC 20549

7. Brokers and Dealers	Securities and Exchange Commission 100 F Street NE Washington, DC 20549
8. Federal Land Banks, Federal Land Bank Associations, Federal Intermediate Credit Banks, and Production Credit Associations	Farm Credit Administration 1501 Farm Credit Drive McLean, VA 22102-5090
9. Retailers, Finance Companies, and All Other Creditors Not Listed Above	FTC Regional Office for region in which the creditor operates or Federal Trade Commission: Consumer Response Center - FCRA Washington, DC 20580 (877) 382-4357

For Nevada Residents:

#### Notice

Under the Fair Credit Reporting Act (FCRA), all consumers are entitled to one free annual file disclosure in any twelve month period. You may be charged a reasonable fee, not exceeding nine dollars, for each additional disclosure within any 12-month period. However, there is no fee if (1) you have been notified of an adverse action taken towards you based upon information appearing in your consumer file within the preceding 60 days, (2) you suspect that your file may contain fraud or you have been the victim of identity theft, or (3) you are unemployed or are currently receiving financial assistance.

"Consumer report" means any communication, written or oral, by a reporting agency regarding the payment history of a particular consumer, including information regarding credit worthiness, credit standing, or credit capacity, which is intended for present or future use in whole or in part to serve as a factor in determining the consumer's eligibility for credit or insurance to be used primarily for personal, family or household purposes, purposes relating to employment, or any other purpose authorized pursuant to the Fair Credit Reporting Act.

A reporting agency may furnish a consumer report concerning you for an extension of credit which you did not initiate only if the contemplated transaction represents a firm offer of credit to you and you meet specific criteria determined by the user, or you have not requested that your name and address be excluded from any list to be provided for such a purpose.

A person shall not procure a consumer report to resell or disclose the report or the information contained in the report unless the person discloses to the reporting agency which originally furnished the report the identity of the intended ultimate user of the report or information, and the only purposes for which the information will be used.

A reporting agency shall not include medical information in its files.

If a person takes adverse action against you based on a consumer report from a reporting agency, the person shall notify you of the action taken; furnish you with the name and address of the reporting agency; and inform you of your right to obtain a copy of the consumer report from the agency.

Upon receiving your request for disclosure, and information sufficient to identify you, a reporting agency shall clearly and accurately disclose to you the nature and substance of information in its files which relates to you at the time of the request, and disclose the names of the institutional sources of information. If you request, the reporting agency shall provide a readable copy of the consumer report, disclose the name of each person who has received from the reporting agency information concerning you within the preceding 2 years for purposes of employment, promotion, reassignment or retention as an employee; or within the preceding 6 months for any other purpose.

A reporting agency shall periodically purge from its files and after purging shall not disclose bankruptcies whose dates of adjudication precede the report by more than 10 years. A report of adjudication must include, if known, the chapter of Title 11 of the United States Code under which the case arose. Except as otherwise provided by a specific statute, any other civil judgment, report of criminal proceedings, or other adverse information which precedes the report by more than 7 years.

You have a right to bring civil action against anyone who willfully or negligently fails to comply with any requirement imposed under the subtitle of Nevada state law outlined above.

#### Nevada Consumers Security Freeze Rights

##### Nevada Consumers Have the Right to Obtain a Security Freeze

You have a right to place a security freeze in your file which will prohibit a reporting agency from releasing any information in your file without your express authorization. A security freeze must be requested in writing by certified mail. The security freeze is designed to prevent a reporting agency from releasing your consumer report without your consent. However, you should be aware that using a security freeze to take control over who is allowed access to the personal and financial information in your file may delay, interfere with or prohibit the timely approval of any subsequent request or application you make regarding a new loan, credit, mortgage, insurance, government services or payments, rental housing, employment, investment, license, cellular telephone, utilities, digital signature, Internet credit card transaction or other services, including an extension of credit at point of sale. When you place a security freeze in your file, you will be provided a personal identification number or password to use if you choose to remove the security freeze from your file or to authorize the temporary release of your consumer report for a specific person or period after the security freeze is in place. To provide that authorization, you must contact the reporting agency and provide all the following:

1. Sufficient identification to verify your identity.

2. Your personal identification number or password provided by the reporting agency.

3. A statement that you choose to remove the security freeze from your file or that you authorize the reporting agency to temporarily release your consumer report. If you authorize the temporary release of your consumer report, you must name the person who is to receive your consumer report or the period for which your consumer report must be available.

A reporting agency must remove the security freeze from your file or authorize the temporary release of your consumer report not later than 3 business days after receiving the above information.

A security freeze does not apply to certain persons, including a person, or collection agencies acting on behalf of a person, with whom you have an existing account that requests information in your consumer report for the purposes of reviewing or collecting the account.

If you wish to obtain a security freeze on your file you should contact First Advantage at: 800-321-4473.

# Exhibit 2



IN THE STATE COURT OF CHEROKEE COUNTY  
STATE OF GEORGIA

STATE OF GEORGIA

V.

WILLIAM KHALIL DAVIS ROUND

CASE NO.

17T04943

PETITION FOR TERMINATION OF  
SENTENCE UNDER O.C.G.A. 42-8-103

Comes now the undersigned PENNY VAUGHAN and respectfully states to this Honorable Court that WILLIAM KHALIL DAVIS ROUND on 15th day of January, 2020 entered a plea of guilty /was found guilty for committing the offense of NO INSURANCE and the Court suspended imposition of sentence and placed HIM on probation under the terms of O.C.G.A. 42-8-103, and...

Wherefore the undersigned respectfully requests that the Honorable Court terminate the probation of the Defendant and discharge HIM in accordance with O.C.G.A. 42-8-103, as amended.

Dated this 26 day of February, 2020.

Penny Vaughan  
Penny Vaughan

ORDER OF TERMINATION

WHEREAS, on the 15th day of January, 2020, the Defendant in the before mentioned case was sentenced to probation under the terms of O.C.G.A. 42-8-103 with a condition that the Defendant may be released upon payment of all Court ordered monies, and...

WHEREAS, the Probation Officer exercising supervision of the Defendant has reported that the Defendant has paid all fines and surcharges in full and the court is satisfied that its action to terminate probation would be in the best interest of justice and the welfare of society.

NOW, THEREFORE, such report and foregoing petition having been read and considered, it is hereby ordered and adjudged that said Defendant be henceforth released and forever discharged from said sentence and probation as of the 24th day of February, 2020.

SO ORDERED and DATED 2/26/20

W. A. [Signature]  
Judge, State Court of Cherokee County

FILED IN OFFICE  
CLERK OF STATE COURT  
CHEROKEE COUNTY, GA.  
2020 FEB 27 PM 2:36  
PATY BAKER, CLERK